

## **Exhibit 2**

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**From:** Baber, Bruce <BBaber@KSLAW.com>  
**Sent:** Monday, January 25, 2016 11:52 AM  
**To:** Wayne Jeung  
**Subject:** RE: Oracle America v. Google, Inc. lawsuit (Case NO. 10-3561-WHA)

Wayne –

I have now received another undeliverable message for one of the three I sent you a short while ago.

Can you please advise which messages you have received? I am guessing that the largest one – which was my “3 of 3” – was the one that did not go through.

Many thanks –

Bruce

Bruce W. Baber  
King & Spalding LLP  
212-827-4079 (New York)  
404-572-4826 (Atlanta)

From: Baber, Bruce  
Sent: Monday, January 25, 2016 12:40 PM  
To: Wayne Jeung (wayne.jeung@lge.com)  
Subject: FW: Oracle America v. Google, Inc. lawsuit (Case NO. 10-3561-WHA)

And this is 3 of 3.

Bruce

Bruce W. Baber  
King & Spalding LLP  
212-827-4079 (New York)  
404-572-4826 (Atlanta)

From: Baber, Bruce  
Sent: Monday, January 25, 2016 12:07 PM  
To: 'Wayne Jeung'  
Cc: 'Renny Hwang'; 'Reid P. Mullen'  
Subject: RE: Oracle America v. Google, Inc. lawsuit (Case NO. 10-3561-WHA)

Wayne –

Attached are the first group of documents that Google intends to produce. A second group will follow in a separate message.

Bruce

Bruce W. Baber  
King & Spalding LLP  
212-827-4079 (New York)  
404-572-4826 (Atlanta)

From: Wayne Jeung [mailto:wayne.jeung@lge.com]  
Sent: Monday, January 18, 2016 8:12 PM  
To: Baber, Bruce  
Cc: 'Renny Hwang'; 'Reid P. Mullen'  
Subject: RE: Oracle America v. Google, Inc. lawsuit (Case NO. 10-3561-WHA)

Thank you, Bruce.

Best regards,

Wayne Jeung  
Legal Counsel  
Business Unit Legal Team 2 | Legal Division LG Electronics Inc.  
Seoul, Korea  
(t) 82.2.3777.3686

wayne.jeung@lge.com

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From: Baber, Bruce [mailto:BBaber@KSLAW.com]  
Sent: Tuesday, January 19, 2016 9:58 AM  
To: Wayne Jeung  
Cc: 'Renny Hwang'; 'Reid P. Mullen'  
Subject: RE: Oracle America v. Google, Inc. lawsuit (Case NO. 10-3561-WHA)

Wayne –

Google is gathering the documents, and we will provide you with copies as soon as that process is complete. And I can confirm that your 14 days will not begin to run until we provide the documents to you.

Bruce

Bruce W. Baber  
King & Spalding LLP  
212-827-4079 (New York)  
404-572-4826 (Atlanta)

From: Wayne Jeung [mailto:wayne.jeung@lge.com]  
Sent: Monday, January 18, 2016 7:44 PM  
To: 'Reid P. Mullen'  
Cc: Baber, Bruce; 'Renny Hwang'  
Subject: RE: Oracle America v. Google, Inc. lawsuit (Case NO. 10-3561-WHA)

Reid,

Thank you for your note. Please provide me with a copy of the documents that Google plans to produce. Also, I would appreciate it if you could confirm that LG's 14 day deadline to object does not begin to run until the documents subject to production are provided to LG.

Look forward to hearing back.

Thank you.

Best regards,

Wayne Jeung  
Legal Counsel  
Business Unit Legal Team 2 | Legal Division LG Electronics Inc.  
Seoul, Korea  
(t) 82.2.3777.3686

wayne.jeung@lge.com

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From: Reid P. Mullen [mailto:RMullen@kvn.com]  
Sent: Thursday, January 14, 2016 12:05 AM  
To: Wayne Jeung  
Cc: Bruce Baber; Renny Hwang  
Subject: Re: Oracle America v. Google, Inc. lawsuit (Case NO. 10-3561-WHA)

Hi Wayne -- Thanks for checking in. We would be happy to provide you with the documents subject to production, and will do so this week or early next.

Also, as I mentioned in my email yesterday, I'd be happy to discuss with you if you have any other questions. Thanks.

Reid

On Jan 13, 2016, at 12:34 AM, Wayne Jeung <wayne.jeung@lge.com> wrote:

Mr. Mullen and Mr. Baber,

I write to you again as I have yet to receive a response to my earlier email regarding Ms. Meghan Landrum's 2016.01.07 letter addressed to LG's Mr. Sung Jin Kang regarding the production of documents that LG's contain confidential information in the above-referenced case. I am attaching a copy of Ms. Landrum's letter.

Ms. Landrum's letter purportedly provides LG with notice and the opportunity to object within 14 days of LG's receipt of her letter. ¶11 of the 2010.12.17 Stipulated Protective Order (attached) provides LG with an opportunity to object or seek a protective order within 14 days of receiving the notice and accompanying information.

To the extent that we have yet to be provided with any of the LG documents that Google intends to produce to Oracle in supplementing its response to Oracle's document requests, I am requesting that Google provide LG with a 14 full days to review these documents, beginning on the date the documents are made available to LG, and to not produce any LG documents to Oracle until LG is provided with the opportunity to object pursuant to the terms of the Court's Protective Order.

I look forward to hearing back from you.

Best regards,

Wayne Jeung  
Legal Counsel  
Business Unit Legal Team 2 | Legal Division LG Electronics Inc.  
Seoul, Korea  
(t) 82.2.3777.3686

wayne.jeung@lge.com

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From: Wayne Jeung [mailto:wayne.jeung@lge.com]  
Sent: Monday, January 11, 2016 2:19 PM  
To: rmullen@kvn.com; 'bbaber@kslaw.com'  
Subject: Oracle America v. Google, Inc. lawsuit (Case NO. 10-3561-WHA)

Mr. Mullen and Mr. Baber,

My name is Wayne Jeung and I am counsel for LG Electronics Inc. I understand that you both serve as outside counsel for Google, Inc. in the Oracle America v. Google, Inc. lawsuit (Case NO. 10-3561-WHA) currently pending in the Northern District of California.

It has come to my attention that Meghan Landrum from Google recently reached out to LG's Sung Jin Kang to advise LG that Google would be producing certain documents that contain LG's confidential information in response to Oracle America's 9th and 10th sets of Requests for Production of Documents in the above-referenced lawsuit.

I write to you now to request a copy of the documents actual documents that Google intends to produce. Given the 14-day timeframe by which LG is being asked to respond I would appreciate it if you could provide me with a copy of these documents as soon as possible.

I look forward to hearing from you.

Thank you.

Best regards,

Wayne Jeung  
Legal Counsel  
Business Unit Legal Team 2 | Legal Division LG Electronics Inc.  
Seoul, Korea  
(t) 82.2.3777.3686

wayne.jeung@lge.com

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<NDA Notice\_LG Electronics Inc.pdf>

<0 66\_2010.12.17 Stipulated Protective Order.pdf>

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